

# **EXHIBIT 11**



# BURLINGTONS

LEGAL

FAO: Mr Cameron Findlay  
C/o Egan Meyer Limited  
1 Mayfair Place  
London  
W1J 8AJ

Date: 23 February 2023  
Our Ref: DPH/AZI.3/2

**BY POST AND EMAIL:** [jim.meyer@eganmeyer.com](mailto:jim.meyer@eganmeyer.com); [richard.egan@eganmeyer.com](mailto:richard.egan@eganmeyer.com)

Dear Mr Findlay,

**Re: Farhad Azima -v- RAKIA & Ors (Claim Number: HC-2016-002798)**

I am a Partner at Burlingtons Legal LLP, the law firm engaged by Mr Farhad Azima to act for him in relation to his ongoing proceedings against, among others, Mr Neil Gerrard, Dechert LLP and the Ras Al Khaimah Investment Authority ("**RAKIA**") (the "**Azima Proceedings**"). The purpose of this letter is to alert you to matters that have come to light in the course of investigations into the Indian 'hack for hire' firm, CyberRoot Risk Advisory Private Limited ("**CyberRoot**"), that directly concern you.

As you may be aware, the role of CyberRoot has been heavily scrutinised in the course of the Azima Proceedings. For instance, evidence has emerged that CyberRoot has received payment of over \$1 million for work done from a company called Vital Management Services ("**Vital**"), which is controlled by Mr Nicholas Del Rosso<sup>1</sup>, and that a material part of that work related to instructions from RAKIA's lawyers Mr Gerrard and/or Dechert<sup>2</sup>. It has separately been confirmed by a former CyberRoot employee that he and others at CyberRoot hacked Mr Azima's computers and emails on the instructions

<sup>1</sup> Please see CyberRoot Kotak Mahindra Bank Statements as exhibited to Mr Al Sadeq's 1782 Application dated 5 February 2022 (MDNC) (**enclosed**).

<sup>2</sup> Please see paragraph 7 of the Second Witness Statement of Nicholas Del Rosso dated 22 February 2021 and paragraphs 13 and 28 of the Answer and Affirmative to Defenses to Complaint (MDNC) (**enclosed**).

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of Vital<sup>3</sup>. I refer you in this regard to the Re-Re-Re-Amended Counterclaim and Claim of Mr Azima in the Azima Proceedings, in which a public account of these allegations has been given (copy **enclosed**).

Late last year, an intelligence agency retained by Mr Azima, Athena Intelligence, received from an anonymous source, within CyberRoot a Wettransfer link to 150Mb of CyberRoot's internal data (the "**CyberRoot Data**").

I am writing to you because the CyberRoot Data contains a number of emails that appear to have been prepared by CyberRoot for the purposes of hacking your electronic data. I set out in Annex A copies of some of these emails. I am authorised to provide you with this information on the basis that the images are copies of clearly non-privileged emails that appear likely to have previously been sent to you and, for that reason, can be expected to be in your possession already. I should, however, make clear that in doing so no waiver of privilege in respect of Athena Intelligence's instruction by Mr Azima and/or its work product is intended or authorised.

The CyberRoot Data contains a number of emails to [cameron@powerchord.com](mailto:cameron@powerchord.com). I understand that you were a director of Powerchord Limited from March 2015 to February 2020 and that in your witness statement in proceedings between *Eurasian Natural Resources Corporation Limited v Dechert LLP* (Claim No.: CL-2017-000583) you named this email account as one by which you had received what you believed to be a number of 'spear phishing' emails.

Screenshots of a number of .html files contained in the CyberRoot Data and sent to this email address are copied in Annex A to this letter.

I understand that the hyperlinks embedded in these emails do not take the user to a website associated with either Microsoft or Google but, instead, to the domain <http://www.lnkshrtty.me>.

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<sup>3</sup> Please see paragraph 15 onwards of the Witness Statement of Jonas Rey dated 11 February 2021 (**enclosed**).



If you wish to pursue these matters further that is a matter for you and we would propose that you approach Athena Intelligence for further information.

Yours sincerely,

*Dominic Holden*

**Dominic Holden**  
**For and on behalf of**  
**Burlingtons Legal LLP**

E [dominic.holden@burlingtons.legal](mailto:dominic.holden@burlingtons.legal)



**ANNEX A**



## New Sign-in Attempt

You have received this email because we detected your account [cameron@powerchord.co.uk](mailto:cameron@powerchord.co.uk) is recently used to sign in to an unrecognized device.

**Details:**

Country/Region: Israel, Jerusalem

IP Address: 2.16.37.0

Date: 16 May, 2018

If this was done by you, you can safely ignore this mail otherwise please review your activity.

**Remove Device**

Thanks,  
Account Team

Microsoft Corporation  
One Microsoft Way  
Redmond, WA  
98052 USA

Copyright 2018 Microsoft Corporation





Hi Cameron,

Your Microsoft account (cameron@powerchord.co.uk) was just used to sign-in from an [unrecognized device](#), using Chrome on Windows 10.



Login Account Details:  
[cameron@powerchord.co.uk](mailto:cameron@powerchord.co.uk)



Windows 10  
12:23 PM  
Location: China  
Browser: Chrome v66

**Don't recognize this activity?**  
Review your [recently used devices](#) now.

Why are we sending this? We take security very seriously and we want to keep you in the loop on important actions in your account. We were unable to determine whether you have used this browser or device with your account before. This can happen when you sign in for the first time on a new computer, phone or browser, when you use your browser's incognito or private browsing mode or clear your cookies or when somebody else is accessing your account.

Sincerely,  
Microsoft Office Support Team

\*The location is approximate and determined by the IP address you're coming from. This email can't receive or send images as specified in this alert. [Click here](#) for more information, visit the [Microsoft Support website](#). If [cameron@powerchord.co.uk](mailto:cameron@powerchord.co.uk) isn't your Microsoft Account, [click here](#) to recommend your email address for this account.

## Microsoft account

| This message is from trusted sender

# Unusual sign-in activity

We detected something unusual about a recent sign-in to the account

[c\\*\\*e\\*\\*n@powerchord.co.uk](mailto:c**e**n@powerchord.co.uk).

### Sign-in details

Country/region: Italy

IP address: 217.61.124.159

Date: 5/2/2018 08:10 AM (GMT + 1)

Platform: Windows

Browser: Internet Explorer

If this wasn't you, Please go to your recent activity now and help us secure your account.

### [Review recent activity](#)

Thanks,  
The account team